

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

MUKESH KUMAR, KESHAV KUMAR,
DEVI LAAL, NIRANJAN, PAPPU, and
BRAJENDRA, *on behalf of themselves and all
others similarly situated,*

Plaintiffs,

v.

BAPS MERCER LLC, BOCHASANWASI
SHRI AKSHAR PURUSHOTTAM
SWAMINARAYAN SANSTHA, INC.,
BHARAT DOE a/k/a BHARAT BHAI,
PANKAJ PATEL, and SWAMI
PRASANAND,

Defendants.

Civ. Action No.: 3:21-cv-11048

**NOTICE OF MOTION FOR
ADMISSION OF DANIEL
WERNER AND PATRICIA
KAKALEC PRO HAC VICE**

PLEASE TAKE NOTICE that the undersigned, attorneys for Plaintiffs in the above-referenced case, will apply for an Order on a date to be assigned by this Court admitting Patricia Kakalec of the firm Kakalec Law PLLC and Daniel Werner of the firm Radford & Keebaugh LLC *pro hac vice*.

Please take further notice that in support of the within motion, Plaintiffs rely on the certifications of Andrew Glenn, Patricia Kakalec, and Daniel Werner.

Please take further notice that a proposed form of order is also submitted herewith.

Dated: Princeton, NJ
May 11, 2021

Respectfully submitted,
JAFFE GLENN LAW GROUP

/s Andrew I. Glenn
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